

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CLINTON CAPITAL CORPORATION, : Case No.: 1:16-mc-00353-
Plaintiff/Judgment Creditor, : LAK-BCM
-against- :
: Civil Action No.: 95.1330
257 WEST 21st STREET ASSOCIATES, INC., 257:
WEST 21st STREET EQUITIES, INC and : NOTICE OF MOTION TO
CHRISTOPHER McNEUR, : WITHDRAW AS COUNSEL
Defendants/Judgment Debtors : AND TO AFFIX A CHARGING
: LIEN AGAINST PLAINTIFF
Judgment for \$382,612.42 docketed 7/5/95, effective:
6/27/95, under Index No.: 94-cv-00731 RPP :
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PLEASE TAKE NOTICE, that upon the accompanying Declaration of Frank E. Borowsky, Jr., and the accompanying Memorandum of Law, Borowsky & Borowsky, LLC respectfully moves this Court pursuant to Local Civil Rule 1.4 before the Honorable Lewis A. Kaplan, United States District Court Judge at the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York City, New York 10007-1312, on a date and time to be designated by the Court for an Order granting (i) leave to withdraw as counsel for Plaintiff; and (ii) a charging lien against any proceeds recovered by Plaintiff in this matter; and (iii) such other relief as the Court deems proper.

BOROWSKY & BOROWSKY, LLC
Attorneys at Law
Attorneys for Plaintiff/Judgment Creditor
s/ Frank E. Borowsky, Jr.
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Dated: November 18, 2021